

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

SAUNDRA G. ELION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civ. Action No. 05-0992 (PLF)
	)	
ALPHONSO R. JACKSON,	)	
Secretary Of Housing And	)	
Urban Development,	)	
	)	
Defendant.	)	
_____	)	

CONSENT MOTION FOR AN EXTENSION OF TIME TO MOVE FOR EQUITABLE RELIEF

Plaintiff to the above action respectfully moves the Court, pursuant to Rule 7, Fed. R. Civ. P., for an additional extension of time of 30 days, until July 9, 2008, to move for an award of equitable relief, to seek an extension to allow for further discussions, or to file a stipulation resolving these matters.

Counsel for defendant has been advised of this Motion and has given defendant's consent.

The grounds in support of this Motion are as follows:

1.) After preliminary discussions, on June 2, 2008, counsel for defendant forwarded a proposal that would provide for one or more of the components of equitable relief due plaintiff as a consequence of her having prevailed on the merits.

2.) Pursuant to the Court's Minute Order of May 7, 2008, the date for the parties to reach agreement regarding an award of equitable relief to plaintiff or to seek an extension of time to do so is today, June 9, 2007.

3.) Plaintiff and her counsel began conferring about defendant's proposal and the remaining elements of equitable relief shortly after the proposal was received. However, their discussions could not be completed due to previously scheduled obligations of plaintiff's counsel, among them Barney v. Paulson, Civ. Action No. 08-0986 (CKK), and McCormick v. District of Columbia, Civ. Action No. 07-0570 (EGS).

4.) Counsel for plaintiff is now actively engaged in preparation for trial in Howard v. District of Columbia, Civ. Action No. 04-2082 (PLF). Consequently, some additional time than would otherwise be anticipated is needed for counsel for the parties to consult about these matters with one another and with their respective clients.

Accordingly, plaintiff respectfully moves the Court for a second enlargement of time of 30 days, until July 9, 2008, to move for equitable relief, to seek further time for discussions, or to file a settlement agreement for the Court's approval.

Respectfully submitted,

/s/
Robert C. Seldon, Esq.
D.C. Bar No. 245100

/s/
Molly E. Buie, Esq.
D.C. Bar No. 483767
Robert C. Seldon & Associates, P.C.
1319 F Street, N.W.

Suite 200
Washington, D.C. 20004
(202) 393-8200

Counsel for Plaintiff